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13 Metropolitan Police Department, Joseph  
14 Lombardo, Kevin Menon, and Ricardo Lopez

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 MARTIN SUNDAY UWAH, an individual,  
18 Plaintiff,

19 Case Number:  
20 2:20-cv-01773-JCM-VCF

21 vs.  
22 LAS VEGAS METROPOLITAN POLICE  
23 DEPARTMENT; JOSEPH LOMBARDO, in  
24 his official capacity as Sheriff; KEVIN  
25 MENON, individually; RICARDO LOPEZ,  
individually; DOE OFFICERS I - III,  
individually,

Defendants.

**STIPULATION AND ORDER**

Pursuant to the United States District Court's May 16, 2022 Minute Order [ECF No. 50], Plaintiff Martin Sunday Uwah, by and through their counsel of record, Margaret A. McLetchie, Esq., Dayvid J. Figler, Esq., and Leo S. Wolpert, Esq., of McLetchie Law, and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), Sheriff Joseph Lombardo ("Lombardo"), Officer Kevin Menon ("Menon"), and Officer Ricardo Lopez ("Lopez"), collectively ("LVMPD Defendants") (collectively the "Parties"), by and through their counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, hereby stipulate and agree to the following:

1. On May 20, 2022, the Parties submitted a stipulation and order to the Court regarding their meet and confer efforts pertaining to LVMPD's pending Motion for Protective Order regarding the FRCP 30(b)(6) deposition topics.

1       2. After reviewing the proposed modified FRCP 30(b)(6) deposition topics, the  
2 Parties agree that Court intervention is no longer necessary.

3       3. As such, LVMPD withdraws its Motion for Protective Order and asks that the  
4 Court vacate any hearing related to the same.

5       4. The Parties further agree that in lieu of Topic No. 16 outlined in the FRCP  
6 30(b)(6) deposition, Plaintiff will be able to propound one interrogatory and one request for  
7 production of documents to LVMPD seeking the requested information.

8       5. The Parties further agree that due to the scheduling of depositions after the  
9 close of discovery, the dispositive motion and pre-trial report deadlines shall be extended by  
10 forty-five days.

11      6. This Stipulation is being entered in good faith and not for purposes of delay.

12           IT IS SO STIPULATED.

13 Dated this 24th day of May, 2022

14 MCLETCHIE LAW

15 By: /s/ Dayvid J. Figler

16 Margaret A. McLetchie, Esq.  
Nevada Bar No. 10931  
Dayvid J. Figler, Esq.  
Nevada Bar No. 4264  
Leo S. Wolpert, Esq.  
Nevada Bar No. 12658  
602 South 10th Street  
Las Vegas, Nevada 89101  
Attorneys for Plaintiff Martin Sunday  
Uwah

Dated this 24th day of May, 2022

MARQUIS AURBACH

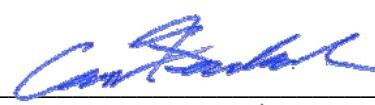
15 By: /s/ Jackie V. Nichols

16 Craig R. Anderson, Esq.  
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10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorneys for Defendants Las Vegas  
Metropolitan Police Department,  
Joseph Lombardo, Kevin Menon, and  
Ricardo Lopez

22           **ORDER**

23           IT IS SO ORDERED this 24th day of May, 2022.

24 IT IS HEREBY ORDERED that the emergency motion for  
protective order (ECF NO. 45) is WITHDRAWN.

25 IT IS FURTHER ORDERED that the last day to file  
dispositive motion is August 25, 2022. Joint Pretrial Order  UNITED STATES MAGISTRATE JUDGE  
must be filed on or before September 26, 2022. If  
dispositive motions are filed, the deadline for filing the  
joint pretrial order will be suspended until 30 days after  
decision on the dispositive motions or further court order.

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that I electronically filed the foregoing **STIPULATION AND**  
3 **ORDER** with the Clerk of the Court for the United States District Court by using the court's  
4 CM/ECF system on the 24th day of May, 2022.

5                    I further certify that all participants in the case are registered CM/ECF users  
6 and that service will be accomplished by the CM/ECF system.

7                    I further certify that some of the participants in the case are not registered  
8 CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid,  
9 or have dispatched it to a third party commercial carrier for delivery within 3 calendar days  
10 to the following non-CM/ECF participants:

11                   N/A

12                   \_\_\_\_\_  
13                   /s/ Krista Busch  
14                   An employee of Marquis Aurbach

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